

UNITED STATES DISTRICT COURT  
FOR THE COMMONWEALTH OF MASSACHUSETTS

DEBORAH KELLY )  
v. Plaintiff, ) DOCKET NO.: 05 10750 REK  
PAUL DONNELLY, MICHAEL BYERS, SGT. )  
KEITH JACKSON, OFFICER JOHN DOE, in their )  
individual and official capacities, and the TOWN )  
OF ROCKLAND, MASSACHUSETTS, )  
Defendants. )  
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)

**DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

Pursuant to Fed. R. Civ. P. 56, the defendants jointly move for summary judgment on all Counts asserted in the Complaint.

In support of their Motion, the defendants submit the accompanying Memorandum of Law in Support of Their Motion for Summary Judgment and Statement of Undisputed Facts in Support of Their Motion for Summary Judgment.

WHEREFORE, the defendants request that the motion be allowed and that judgment enter in their favor.

Respectfully submitted,  
The Defendants  
By their attorneys,

PIERCE, DAVIS & PERRITANO, LLP

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**Certificate of Service**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on February 8, 2006.

/s/ Jeffrey M. Sankey  
Jeffrey M. Sankey